UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

April 5, 2019

Mr. Curtis E. Borland
U.S. Coast Guard (CG-OES-2)
Vessel and Facilities Operating
2703 Martin Luther King, Jr. Avenue, SE
Washington, DC 20593-7509

Ms. Yvette Fields, Director
Office of Deepwater Ports & Offshore Activities
Maritime Administration (MAR-530)
1200 New Jersey Avenue, SE
Washington, DC 20590

RE: Marine Vessel Loading emissions

Dear Mr. Borland and Ms. Fields:

Starting in late 2017 when the Maritime Administration and the U.S. Coast Guard were first hearing from potential applicants for licenses under the Deepwater Port Act to construct and operate crude oil export terminals in Federal waters of the Gulf of Mexico, I shared that EPA had not, up to then, permitted facilities of that type and therefore, had not addressed the emissions from the marine vessel loading operations. Since then, especially as individual projects with varying designs and complexities were proposed, EPA has held a number of internal deliberations.

Recently we have had significant discussions with EPA senior management in the Office of Air and Radiation (OAR) regarding the pending crude oil export projects. We are providing an update with respect to the current projects where we have pending air permit applications [Enterprise Products Sea Port Oil Terminal (SPOT) and Texas Gulf Terminals Incorporated (TGTI)].

At this time, we have declared the Enterprise Products SPOT Prevention of Significant Deterioration (PSD) air permit application complete and we will soon start development of our draft PSD/Title V permit where we intend to apply as applicable requirements the provisions of 40 CFR § 63 – Subpart Y for Marine Tank Vessel Loading Operations based on the design of their project, including the construction and use of a platform structure to facilitate loading operations at their offshore loading terminal.

With respect to TGTI, we currently intend to proceed forward proposing an action on their Clean Air Act Section 112(g) case-by-case maximum achievable control technology (MACT) application based on the design of their project (single point mooring buoy without a platform structure) and the anticipated receipt of some additional speciation information on their hazardous air pollutant (HAP) emissions.

As we proceed forward on these projects, we would encourage other prospective applicants to evaluate how their marine tank vessels loading project compares to these two differently designed projects, with or without a platform structure, in determining how to address or control HAP emissions.

Please contact me or Jeff Robinson, Air Permits Branch Chief, if you have questions regarding this information.

Sincerely yours,

Robert D. Lawrence
Policy Advisor – Energy Issues
EPA Region 6